

1 **JENNY L. FOLEY, Ph.D., ESQ.**
Nevada Bar No. 9017
2 E-mail: jfoley@hkm.com
3 **HKM EMPLOYMENT ATTORNEYS LLP**
101 Convention Center Drive, Suite 600
4 Las Vegas, Nevada 89109
Tel: (702) 805-8340
5 Fax: (702) 805-8340
6 *Attorneys for Plaintiff*

7 **MARIO P. LOVATO, ESQ.**
Nevada Bar No. 7427
8 Email: mpl@lovatolaw.com
9 **LOVATO LAW FIRM, P.C**
7465 W. Lake Mead Blvd., Suite 100
Las Vegas, Nevada 89128
10 Telephone: (702) 979-9047
11 *Attorneys for Defendant*

12
13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 RASHAUD BLANDBURG, an Individual,
16
17 Plaintiff,

18 vs.

19 ADVANCED LIGHTING AND
20 ELECTRIC, INC., DOES I -X; ROE
CORPORATIONS I -X.

21
22 Defendant.

CASE NO.: 2:19-cv-01519-RFB-BNW

**STIPULATION AND ORDER TO
EXTEND TIME FOR PARTIES TO
SUBMIT JOINT PRETRIAL ORDER**

(THIRD REQUEST)

23
24 Plaintiff Rashaud Blandburg (“Plaintiff”), and Defendant Advanced Lighting and
25 Electric, Inc. (“Advanced Lighting”), through their respective attorneys of record, stipulate to,
26 and agree upon, an additional extension of the deadline to submit a joint pretrial order, as
27 follows.

28 On February 3, 2022, Plaintiff filed his Motion for Partial Summary Judgment. [ECF

1 58], which was opposed by Advanced Lighting. After oral argument, on September 28, 2022,
2 this Court entered its Order denying Plaintiff's Motion for Partial Summary Judgment. [ECF
3 75]. On November 4, 2022, this Court granted the parties' first request to extend the deadline
4 to submit the joint pretrial order in this case to November 28, 2022. [ECF 77].

5 Because of the holidays and continued issues arising from Plaintiff's counsel's family
6 medical emergency, the parties have been unable to meet and confer with regard to the joint
7 pretrial order. To give the parties sufficient time to meet and confer to finalize the joint pretrial
8 order, the parties hereby stipulate and agree the parties shall have until **February 28, 2022**, to
9 submit the joint pretrial order.

10 Plaintiff's counsel's on-going family emergency and a death in Plaintiff's counsel's
11 family similarly delayed approval of this proposed stipulation constituting good cause for the
12 delay in submitting this request.

13 ///

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 This is the third request to extend the joint pretrial order deadline and is not made for
2 purposes of undue delay.

3 Dated this 6th Day of February, 2023.

4 **HKM EMPLOYMENT ATTORNEYS LLP LOVATO LAW FIRM, P.C**


5 By: /s/ Jenny L. Foley
6 JENNY L. FOLEY, Ph.D., ESQ.
7 Nevada Bar No. 9017
8 101 Convention Center Drive, Suite 600
9 Las Vegas, Nevada 89109
10 Telephone: (702) 805-8340
11 Facsimile: (702) 805-8340
12 Email: jfoley@hkm.com
13 *Attorneys for Plaintiff*

By: /s/ Mario P. Lovato
MARIO P. LOVATO, ESQ.
Nevada Bar No. 7427
7465 W. Lake Mead Blvd., Suite 100
Las Vegas, Nevada 89128
Telephone: (702) 979-9047
Email: mpl@lovatolaw.com
Attorneys for Defendant

14 **ORDER**

15 IT IS SO ORDERED:

16 DATED: March 1, 2023.

17 
18 **RICHARD E. BOULWARE, II**
19 **United States District Court**
20
21
22
23
24
25
26
27
28